

# **Exhibit 8**

**Confidential**

**In re Facebook Biometric  
Information Privacy Litigation**

**Joachim De Lombaert**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re FACEBOOK BIOMETRIC ) Master File No.  
INFORMATION PRIVACY LITIGATION, ) 3:15-cv-03747-JD  
 )  
\_\_\_\_\_)  
 )  
 )  
This Document Relates To: )  
\_\_\_\_\_)

SOURCE CODE CONFIDENTIAL - ATTORNEYS' EYES ONLY  
UNDER PROTECTIVE ORDER  
VIDEOTAPED DEPOSITION OF JOACHIM DE LOMBAERT  
Friday, February 12, 2016  
Palo Alto, California

Reported By:  
Hanna Kim, CLR, CSR No. 13083  
Job No.: 10021967

Confidential

In re Facebook Biometric  
Information Privacy Litigation

Joachim De Lombaert

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re FACEBOOK BIOMETRIC ) Master File No.  
INFORMATION PRIVACY LITIGATION, ) 3:15-cv-03747-JD  
 )  
 )  
 )  
 )  
 )  
This Document Relates To: )  
 )

Videotaped deposition of JOACHIM  
DE LOMBAERT taken on behalf of the  
Plaintiffs at the law offices of Mayer  
Brown, located at Two Palo Alto Square,  
Suite 300, 3000 El Camino Real, Palo Alto,  
California 94306, on February 12th, 2016,  
before Hanna Kim, Certified LiveNote  
Reporter, Certified Shorthand Reporter,  
No. 13083.

Confidential

In re Facebook Biometric  
Information Privacy Litigation

Joachim De Lombaert

1 for the record.

2 A. Sure. My name is Joachim De Lombaert, and  
3 it's spelled J-O-A-C-H-I-M, D-E, space,  
4 L-O-M-B-A-E-R-T.

5 Q. All right.

6 And have you ever been deposed before?

7 A. No.

8 Q. Have you ever testified in court before?

9 A. No.

10 Q. Okay. Well, this will be a lot of fun.

11 You understand that you're here as a  
12 30(b)(6) deponent, which means you're going to be  
13 giving Facebook's, the company's, formal testimony  
14 about the sign-up process for Facebook?

15 Do you understand that?

16 A. Yes.

17 Q. Okay. And, when in -- in this deposition,  
18 when I say "you," I'm going to be referring to  
19 Facebook. All right?

20 A. Yes.

21 Q. Okay. And, if I mean you personally, I'll  
22 say you. Otherwise, when I say "you," it's  
23 Facebook, all right.

24 So you should be completely truthful.  
25 That means, obviously, don't mis- -- don't mislead

Confidential

In re Facebook Biometric  
Information Privacy Litigation

Joachim De Lombaert

1 coffee, bathroom, anything, or if you just get  
2 tired, will you tell me?

3 A. Yes.

4 Q. Okay. Then we'll take a break. All  
5 right.

6 There's one exception to that, which is if  
7 I'm asking you a question, answer the question first  
8 and then we'll take a break. Okay?

9 A. Okay.

10 Q. Okay. What is your official title at  
11 Facebook?

12 MR. NADOLENCO: So, Alex, just before you  
13 get rolling on the questions, we -- as you noted,  
14 he's a 30(b)(6) witness. And, especially, if you're  
15 going to say "you" is the same as Facebook, I just  
16 want to make clear, we are designating the witness  
17 on, actually, portions of all of the seven topics,  
18 but subject to the objections we served and we  
19 discussed at some length yesterday.

20 MR. NGUYEN: Understood. Okay.

21 BY MR. NGUYEN:

22 Q. What's your official title at Facebook?

23 A. I'm an engineering manager.

24 Q. And as engineering manager for Facebook,  
25 how long have you been in that position?